

United States District Court
Northern District of New York
Form To Be Used In Filing A Complaint
Under The Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint Form)

U.S. DISTRICT COURT - N.D. OF N.Y.
FILED
SEP 29 2014
AT _____ O'CLOCK
Lawrence K. Baerman, Clerk - Syracuse

1. Caption of Action

Full Name ~~And~~ Number of Plaintiff:

Mr. Jessie Christopher Engles D# 09A0673

VS

Jury Trial: Yes ☒ NO ☐
Civil Rights Act 42 USC § 1983
Complaint

Full name(s) of Defendants:

- | | |
|--|---|
| (1) C.O. MARK T. SOUZA | (11) C.O. RYAN RUGARI |
| (2) C.O. ROBERT P. BAUSE | (12) Teri Thomasko ZAK IGP Supervisor |
| (3) Sgt. Stephen G. Campbell | (13) C.O. DAVID M. MURPHY |
| (4) C.O. LAWRENCE M. TAMBURRINO | (14) Dr. FARAGO, I. |
| (5) C.O. BRIAN J. COOMES | (15) Joseph Bellnier Dep. Comm. for Discs. |
| (6) C.O. JAMES C. HOFFMAN | (16) MAUREEN E. BELL Dep. Comm. for Discs. |
| (7) C.O. MICHAEL E. BARNEKROW | (17) LISA KALIES, OMH Unit Chief |
| (8) Nurse Theather L. Sybolt | (18) Lauren McMahon OMH Psychologist |
| (9) BRYAN HILTON Dep. Supt. of Mental Health | (19) C.O. Angeles Deferres t. |
| (10) Nurse BRIAN H. DOUGHERTY | (20) Preserve rights to Add other Jane/John Does Defendants |

2. Statement of Jurisdiction

This is a civil action seeking relief &/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This Action is brought pursuant to 42 U.S.C. § 1983. The Court has Jurisdiction over the Action pursuant to 28 U.S.C. §§ 1331, 1343 (3) & (4) And 2201.

3. Parties To this Action

Plaintiff's Information: Jessie C. Engles D# 09A0673
Address of Plaintiff: Five Points Correctional Facility
P.O. Box #119
Rensselaer, NY 14541

- 1# Defendant: Mark T. Souza
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMHU)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403
- 2# Defendant: Robert P. BAUSE
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMHU)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403
- 3# Defendants: Stephen G. Campbell
Official Position: Correction Sergeant (Sgt.)
Address: Marcy Correctional Facility (RMHU)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403
- 4# Defendants: Lawrence M. Tamburino
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMHU)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403
- 5# Defendant: Brian J. Loomis
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMHU)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403
- 6# Defendant: James C. Hoffman
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMHU)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

7[#] Defendant: Michael E. BARNEKROW
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

8[#] Defendant: Theater L. Sybolt
Official Position: Nurse
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

9[#] Defendant: Bryan Hilton
Official Position: Deputy Superintendent of Mental Health Fac. (RMH4)
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

10[#] Defendant: Brian H. Dougherty
Official Position: Nurse
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

11[#] Defendant: Ryan Rugari
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

12[#] Defendant: Teri Thomaskozak
Official Position: Inmate Grievance Program Supervisor.
Address: Marcy Correctional Facility
9000 Old River Road, P.O. Box #5000
Marcy, N.Y. 13403

13#

Defendant: David M. Murphy
Official Position: Correction Officer (C.O.)
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, NY. 13403

14#

Defendant: I. Farago
Official Position: DMH. Psychiatrist Doctor
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, NY. 13403

15#

Defendant: Joseph Bellnier (At the time of incident he was the Supt.)
Official Position: Current Position Deputy Commissioner of Facilities For DOCCS.
Address: New York State, Department of Corrections & Community Supervision, 1220 Washington Ave., Albany NY. 12226

16#

Defendant: Maureen E. Bell
Official Position: Deputy Commissioner of Counsel For D.O.C.C.S.
Address: New York State, Department of Corrections & Community Supervision
1220 Washington Ave., Albany NY. 12226

17#

Defendant: Lisa Kalies
Official Position: O.M.H. Unit Chief of RMH4.
Address: Marcy Correctional Facility, (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, NY. 13403

18#

Defendant: Lauren McMahon
Official Position: O.M.H. Psychologist
Address: Marcy Correctional Facility (RMH4)
9000 Old River Road, P.O. Box #5000
Marcy, NY. 13403

19#

Defendant: Angeles Deferrest

Official Position: Correction Officer (C.O.)

Address: Marcy Correctional Facility, ~~██████████~~
9000 Old River Road, P.O. Box # 5000
Marcy, N.Y. 13403

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Defendant's Preserve Rights to list/add other Jane/John Does Defendant(s) either, Nurses, Doctors, Prison Officers or O.M.H. (Office of Mental Health) Personnels.

4. PLACE OF CONFINEMENT

(a). Is there a prisoner grievance procedure At the Facility where incident occurred? Yes.

(b). If your Answer to (4)(a) is Yes, did you present the facts relating to your Complaints ~~at~~ that grievance Program? Yes.

If your Answer to (4)(b) is Yes,

(1) what steps did you take?? I exhausted all my facility Administrative Remedies, with all grounds listed in the Statement of Facts regarding O.M.H. Staffs, DOCCS Prison Officers, DOCCS Nurses/Doctors, & FOIL Request Matters to the highest Level / Final process, which DOCCS officials (both Officers & Nurses) grievances must be filed with I.G.R.C. office, than Appeal to the Supt., than Appealed to C.O.R.C. office. with respect to O.M.H. Staffs, any grievances must be filed with the unit Chief of the Facility, than the Superintendent of C.N.Y.P.C., AND than Appeal to NYS O.M.H. Commissioner. And with respect to Any Freedom of Information Law Request (FOIL) it must be filed with the Facility Inmate Records office, than Appeal to Dep. Comm. of Counsel for DOCCS., which was All followed by Plaintiff.

(2) what was the Final results of your grievances? Denied, due to I.G.R.C. office is not meant to Address an Adverse decision regarding incidents of Assaults by Prison Officials.

(5)

And with respect to the other grievances issues, it was either denied, or Accepted; granted in part, with No Affirmative Actions being taking to resolve these grievances filed by Plaintiff to prevent it from happening Again.

(C) IF there is no grievances procedures in your Institution, did you complain to prison Authorities About the Facts Alleged in your complaint? Yes: N/A No: N/A But I did file complaints with the Inspectors General Office for DOCCS.

5. Previous Lawsuits

(a) Have you ever filed Any other Law suits in state or Any Federal Courts relating to your Complaint in such imprisonment? Yes: ✓

(b.) If your Answer to (5)(a) is yes, you must describe Any & All Lawsuits, currently pending or closed, in the Space provided below:

(For Each Lawsuit, Provide the same Information)

(1) Parties To Previous Lawsuit.

(a) Plaintiff: Jessie Engles

(b) Defendant(s): Capt. Dunbar et al

(2) Southern District Of New York

(3) Docket # 09 Civ. 2457 (NRB)

(4) Name of Judge Assigned to the Case: Naomi Rice Buchwald

(5) Approximate date of filing suit Feb. OF 2007

(6) Is the case still Pending: No.
(6)

(7) What was the result of the case. The Summary Judgment was granted, & the Complaint was dismissed in its entirety.

(1) (a.) Plaintiff: Jessie C. Engles

(b) Defendants: C.O. Terrares, et al.

(2) Southern District of New York

(3) Docket # 09 Civ. 610 (RJS)(H.B.P)

(4) Name of Judge Assigned to the case: Richard J. Sullivan.

(5) Approximately date of filing suit: 8-29-2008.

(6) Is the Case Still Pending: NO.

(7) What was the result of the case: It was settled in the Southern District of New York.

(1) (a.) Plaintiff: Jessie C. Engles

(b.) Defendant(s) Sgt Jerry Jones, et al

(2) Western District of New York

(3) Docket # 13-cv-6461 (C.J.S.)

(4) Name of Judge Assigned to the case: Charles J. Siragusa

(5) Approximate Date of filing suit: 8-16-2013

(6) Is the case still Pending: YES.

(7) What was the result of the case. It ~~was~~ is still pending.

- (1)(a) Plaintiff: Jessie C. Engles
(b) Defendants: C.D. Golembuski, C.O. David, Capt Serra et al.
(2) Eastern District of New York.
(3) Docket # ? (Don't Remember)
(4) Name of Judge Assigned to the Case: ? (Don't Remember)
(5) Approximate date of filing suit: 5-06-2004 or 2005
(6) Is the case still pending: **No.**
(7) What was the result of the case: It was settled.

- (1)(a) Plaintiff: Jessie C. Engles
(b) Defendant: State of New York
(2) Albany Court of Claims.
(3) Name of Judge Assigned to the case: (Don't know)
(4) Approximate Date of filing suit: 9-25-09
(5) Is the case still pending: NO
(6) The index # 10427-09
(7) What was the result of the case: Dismissed.

- (1)(a) Plaintiff: Jessie C. Engles
(b) Defendant: State of New York
(2) Albany Court of Claims
(8)

- (3) Docket # 123727
- (4) NAME of Judge Assigned to the case: Don't know
- (5) Approximate Date of Filing suit: Dec. 21, 2013
- (6) Is the case still pending: Yes.
- (7) What was the result of the case: It's still pending.
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6. Statement of Facts

- ① The incident took place at Marcy Correctional Facility, At the Residential Mental Health Unit (RMHU) on April 15, 2011 or 2012. The Above listed prison officials used Excessive use of Force, and Violated the Constitutional Rights of United States, As followed:
- ② ON 4-15-11 or 4-15-12, I WAS physically Assaulted by six or more Correctional Officers, in front of Sgt. Stephen Cambell At Marcy Corr. Fac. (RMHU) At approximately 8:00 AM And the incident was over About 1:00 PM.
- ③ It started when I was being escorted to programs in the (RMHU) group Classes. I had informed C.O. M. Souza that I needed to speak to AN Mental Health counselor, because I'm going through A Mental issues concerning the death of my FATHER, AND that officer stated "No." C.O. Souza then said, "go to programs". I then informed him, "I'm not going to programs unless I speak to AN O.M.H. Counselor, so I can get some help." That C.O. Stated "NO, you are going to go to programs or back to your cell, now pick one!" because you are holding things up. I Nicely informed that officer that I wasn't going Anywhere until I got some ~~help~~ help.

④ At this point, C.O. M. Souza became mad, and tried to MAN-handle me, to force me back to my cell. When that officer realized I was not walking, he took me down to the floor and began to punch me in my face while my hands were cuffed to a waist chain snackle, and this happened in front of the video cameras with no regards to the facility rules & regulations.

⑤ After being carried to the medical clinic area, the nurse T. Sybolt refused to EXAMINE me, because she said I didn't want to talk. So she falsified documents, by stating on the inmate injury report form, that I refused medical treatment. This also happened on video cameras. Then those officers who help assist C.O. Souza when he took me down to the floor, which are, C.O. R. Bause, C.O. L. Tamburrino, C.O. B. Loomis, C.O. J. Hoffman, & C.O. M. Barnekow, in front of Sgt. Campbell & Dep. Supt. of Mental Health B. Hilton.

⑥ C.O. M. Souza, C.O. R. Bause, C.O. L. Tamburrino, C.O. B. Loomis, C.O. J. Hoffman, C.O. M. Barnekow all then tried to walk me back to my cell, I stopped & refused to walk until I speak to OMH counselor. At this time, these officers took me down to the floor again, SLAMING me face first & started hitting me some more & one of them knicked me in my ribs. I remember seeing Dep. Supt. B. Hilton present during this time & Sgt. Campbell & neither one of those prison supervisors stopped or made any attempt to stop their subordinates from using excessive force on me in front of the video camera tapes.

⑦ I was then placed on a black stretcher & carried into my cell (B1-3 cell) where those officers involved above began to punch, kick me in my face, ribs, & private parts. Because I refused to let them take the cuffs off of me & feet/legs shackles until I speak with OMH staffs. When they realized the display of force, wasn't getting me to comply, they took their batons (night sticks) out and began to hit me with them in my arms, legs, ribs, back for over 15 minutes, maybe longer, and then I was tied up

Like A pig with my state sheets. They took my sheets off my bed, AND tied my legs together First, than they took my other state sheets AND tied up my hands & arms together. When I tried to move, they had wrapped that sheet around my neck until I was choked unconscious for god knows how long?

(8) ONCE, ~~they~~ I had regain back my consciousness, I realized I WAS still tied with the state sheets, & all legs cuff shackles & hand cuffs, cuffed to a waist chain was all gone, AND I WAS Kicked under the bed frame in the cell. While those officers was leaving my cell, I rolled from under my bed frame, AND hopped to my feet & started hopping to the cell door & got stuck half in my cell & half of my other body parts out the cell door. I than started screaming "I'm requesting to be seen by medical staffs & OMH Counselors for what just happen to me."

(9) These officers had denied me my rights to be seen by Medical & to speak to OMH Again & began to hit me with their night sticks. C.O. Hoffman, C.O. Tamburrino, & C.O. Bause are the ones I believe who were hitting me in my arms & ribs area while I was stuck between my cell door & wall area & could not move. They hit me in my arms over 40 times, than poked me in my ribs, when my arms started leaking blood. This also took place on video cameras on B-1-company until I was pushed into my cell by those officers.

(10) Those officers left me in my cell from 8:00 AM all the way until 1:30 PM, with no medical attention. AND I could have died if my ribs had broke & collapse my lungs when other prisoners was returning from their programs group classes at approximately 11:00 AM, AND realized what happen to me & I explained to them I'm in pain & need help getting medical attention. One prisoner refused to go back into his cell until they get medical staff to see me for my injuries. And other prisoners started

(10)

And was banging on their cell doors threatening to hang up if they don't get medical staff to treat me for my injuries AND get OMH counselors down here to see them & me for our issues regarding Prison officers Attempt to cover up my incident.

(11) That is when Medical Staff & OMH was notified of my injuries At 1:30 PM AND I was taken to St. Luke's - hospital for my injuries. After returning from the outside hospital, I was then placed in the RC-TP Strip cell NAKED & held me there from 4-15- to - 4-20- for punitive reasons, because I never threaten to kill myself, nor did I try to do such. I was simply Assaulted by Prison officials, for trying to seek help from OMH regarding the death of my father.

(12) Please note, the whole time I was being Assaulted by Prison officials, I was in full shackles (both hands cuffed to a waist chain & feet/legs shackled together) AND I was unable to attempt any harm to any of them. Nor did I hit any of them, or attempt to do such acts. So there was no need to justify those officers use of excessive force, and neither, Deputy B. Hilton, nor Sgt. Cambell made any attempts to stop these prison officers for their Assault on me, nor was they reprimanded for their actions stated herein. I was also denied prompt medical treatment, which I believe was a clear attempt on my life by DOCCS & Medical staff in violation of my constitutional rights.

Other Harassment & Misconduct By Prison Official & Excessive force.

(13) Since the 4-15-11 incident, I have been continually harass & the subject of prison misconduct in different forms AND fashions. But some of the other main dates of incidents was from Oct. 10, 2011 until 7-10-12 when I was transferred out that facility, & AMHU of Marcy Corr. facility.

(14) C.O. RYAN RUGARI, C.O. SEAN WIGGINS, Along with other unknown Correction officials tampered with my MAIL with the knowledge of the Dep. Supt. B. Hilton, I.G.P. Supervisor T. Thomaskozak etc, whom failed to correct these unlawful practices of these sub-ordinates.

(15) The Mail Alleged in paragraph 14 to have been tampered with, which includes MAIL to the Commissioner of DOCCS, (Past & current one) The Superintendent Past (Mr. Joseph Bellnier & current one) of Marcy Corr. Facility, To Teri Thomaskozak I.G.P.S., MAureen E. Bell, Dep. Comm. of Counselor for DOCCS, Lisa Kalies Unit Chief of OMH for Marcy RMH, To the Attorney General office of the State of New York, The Court of Claims, to various Attorneys, AND various businesses & vendors, AS WELL AS my Sisters & Brothers & other love ones, etc, etc,

(16) The incident describe in paragraphs 14 & 15, had deprived me of my State & Federal constitution rights to freedom of speech & states AND created A Liberty interests of Access to the Courts, which Petitioning the Government for redress of grievances, freedom of Association, expression & speech AND have lead to interruption with family contacts, which caused Plaintiff emotional Trauma & inability to file complaints & Answers with the Courts in a timely fashion, MANNER

(17) on Oct 7, 2011, I was denied lunch by correction officials, with the knowledge of the with corrections officials Supervisors, whom failed to correct this unlawful practice of certain officers, AND it happen on more than one occasion. I was also wrongfully denied recreation by these prison officials on a few occasions. Either C.O. R. Rugari & C.O. S. Wiggins harassed me continuously by closing my cell shield without due cause or A shield order. They also verbally threaten to kill me & falsify records of Criminal Charges if I live.

(18) C.O. R. Rugari & C.O. S. Wiggins had instigated inmate Stephen Fox D.N #06A0135 to Assault me, and they will give him things to compensate him for his Actions. And they are the ones who got Stephen Fox cell open, along with mines, with neither of us in any type of cuffs or restraints or escort officers present, and he has a life bid & could have killed me if he wanted to.

(19) on Oct. 13, 2011, C.O. Rugari, had harassed me, during & prior to my Cardiac Medical emergency and he had exercised undue influence on the Medical Nurses B. Dougherty & on [REDACTED] OMH. And upon information & belief, C.O. Rugari conducted an unauthorized cell frisk while I wasn't present & destroyed my Magazines & Cosmetics & smoked at least one cigarette in my cell (Leaving Ashes) Although I am an Asthmatic.

(20) on November 7, 2011 & Dec. 2, 2011, I was set up with false/fabricated negative informational reports which denied me due process rights under U.S. Const. 14th Amendment, by unknown Prison Officials. Which had prevented me from getting time cuts from getting out of the (BMH4) & back into General Population & other DOCCS privileges rights and affected my Conditional Release date.

(21) Although the dates & incidents mentioned above are the most substantial incidents, there was countless others occurrences of an on harassment since 9-15 incident until 7-10-12, which I filed numerous of Grievances & Notices of Intentions with the Attorney General Office, ~~that~~ BMH4 at Marcy Corr. Fac. I & RC Office ...

(22) upon information & belief, the Actions described in the paragraphs 13-21 are a pattern of retaliation against me for exhausting my Administrative remedies by filing Grievances & complaints with the Courts with
(18)

regards to my 4-15-11 complaint incident & with the filing of my Notice of intentions to file a claim with the Attorney General Office, as well as the filing of Grievances I had filed in any other incident I've experienced since then, where I was pressed by prison officials not to pursue Court Actions and continue to litigate these matters.

(23) As a result of these numerous Misconducts listed above C.O. R. Rugari, C.O. D. Murphy, C.O. Lawrence Tamburino, C.O. B. Loomis, C.O. J. Hoffman, C.O. M. Barnekow, C.O. Mable Temple, all played a part & roles in these matters of the Harassment & Misconduct by Prison Officials which caused Plaintiff serious injuries, emotional distress, where Plaintiff made numerous attempts to commit suicide, by overdosing on pills, hanging up, cutting up etc, etc. And the Dep. Supt. B. Hilton, Teri Thomas Kozak IGPS, Joseph Bellnier, Lisa Kalies Unit Chief, Lauren McMahon, was all aware of these issues & incidents and did nothing to resolve or address these matters stated herein.

Count III: Inadequate Medical & Mental Health Care & treatments & Misconducts.

(24) Commencing on or about Sept. 18, 2011, - to - 7-10-12, while I was at Sullivan Corr. Fac. (RCTP) and had continued when I returned to Marcy (RMH) I was very depressed due to being denied of all my mental health medications prescribed by OMH Psychiatrist Dr. Farago, leading to the mental deterioration, paranoia, suicidal ideation, episodes of anger, depression and increased impulsiveness which resulted in additional Misbehavior reports being filed.

(25) From 4-15-11 until 7-10-12, OMH Psychiatrist Dr. Farago had changed my mental health medications at least 3 times or more, which constantly caused a chemical imbalance in my head & contributed to the problems of my

(15)

MANY incidents I had experienced At Marcy (BMH) which lead to me being rearrested on new criminal charges of ASSAULT ON PRISON OFFICIALS.

(26) Prior to & Since Sept. 20, 2011, I WAS deprived of my private interviews with my primary therapist & Psychiatrist sessions, as well as attendance to my OMH group classes programs, where such acts interfered with my rights to receive Adequate Mental Health — treatment, which all played a part in taking advantage of my Mental illness of Bi Polar & MANIC depression AND Anti Social PARANOID personality disorders patient.

(27) ON Oct. 13, 2011, Brian H Dougherty RN, After being instigated & influence by corrections officers verbally Abused me, denied me Medical examinations, AND use of force pictures was never taking, & I WAS denied proper treatment for my injuries from this [redacted] incident use of force. Which had interfered with my rights to received care & treatment (from [redacted] Members of my treatment team) in full [redacted] respect to my dignity & personal integrity Pursuant to the Article 33 of the NYS Mental Hygiene Law, I deprive me of my rights to receive Adequate Medical care treatment & led to pain & Mental Anguish do to the continued Abuse & mistreatment I've experience by DOCCS officials, OMH, AND Medical Staffs Alike.

(28) ON Oct. "13th", "18th", "20th", & "30th" of 2011, As well as November "8th", & "13th" & "15th" of 2011 Various of Prison officials of DOCCS, As well as Nurse Sybolt (RN) had denied me Access to sick call, which I WAS seeking X-Rays For A serious Medical conditions subстанed From AN ASSAULT / excessive use of force by CO. R. Rugari ON Oct. 13, 2011 & when this conduct led to unnecessary PAIN & [redacted] physical suffering, & deprived Me Adequate Medical Care.

(29) Based on information & belief, the Actions described in Paragraph "28", occurred to cover up an Assault upon Plaintiff.

(30) On & off, since the month of November, Nurse Dougherty (AN) & Nurse Sybolt (AN) & others unknown nurses have been passing my cell, & refusing me my Pain Medications, by not offering it to me during their Meds Rounds on the 7-3 shifts & the 3-11 shifts. which led to me experiencing more pains & inadequate medical treatments.



Count IV Excessive force

(31) On Oct. 13, 2011 Correction Officer R. Rugari, Co. Murphy utilized excessive force during a use of force incident by Assaulting me, leading to a possible fracture finger, numerous lacerations & contusion which were not treated by Nurse B. Dougherty. As mention else where Above.

(32) On Oct. 6, 2011, C.O. Siriano & Barber, utilized excessive force, while trying to regain there hand cuffs leading to bruises & swelling.

(33) I informed OM# Ms Lauren McMahon, Lisa Kalies, Joseph Bellnier, Dept. Supt. Hilton, IGPS T. Thomasozak and others who All Failed to help me by doing what's in their Job description duties to resolve or Address these problems.

(34) I filed numerous of F.O.I.L. request regard All these many incident to preserve proof of All video camera tapes, hearing tapes, documentation of written evidence & more, which C.D. Angeles Deferrest have wrongfully Failed to ~~carry~~ carry out her duties regard such in some incidents & wrongful overcharged or denied me such documents under McKinney's Public Officer Law

§ 84-90 And when Appealed to Maureen E. Boll, Dep. Comm. of Counsel for DOCCS, had also refused to provide such by not responding to my Appeal correcting these sub-ordinate Actions by C.O. A Deferrest, which contributed to the Attempt to cover up these prison officials Action at Marcy (RMH4) during these incidents time frames described Above AND the possible lost or destruction of same evidence.

Prayer For Relief

(35) wherefore, Plaintiff request this Court to grant the following relief: Plaintiff request an order declaring that defendants violated the 1st, 8th & 14th Amendments of the U.S. Constitution, AND the American Disability Acts AND Plaintiff request 15 Million in Compensatory damages Awards these prison officials UNLAWFUL Acts AND 5 Million in punitive Damages be order that all 14 Plus defendants collectively pay for their Actions explained Above. I Also seek that these incidents be submitted to A District Attorney for Criminal charges before A grand jury and that they be Stripped of their job titles description of lack of willingness to follow their own Rules, Regulation & procedures.

(36) Do you want a jury trial Yes ☒ No ☐.

(37) I declare under penalty of perjury that the foregoing is true & correct to the best of my knowledge AND his rights as stated Above, which contributed to Plaintiff receiving AN excess of 10 years of SHU/Box time in the (RMH4) CC: Filed / SE. / Courts

Sworn to before me this
21 day of September 2014

Notary Public

Sincerely
Jesse Ingles
Plaintiff Pro Se

JOEL JENEAULT
Notary Public, State of New York
Qual. in Ontario Co. No. 01166151431
My Commission Expires Oct. 6, 2014